

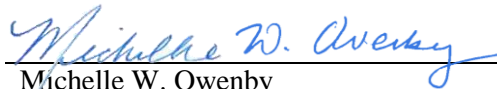


**STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE**

PERMIT TO CONSTRUCT / MODIFY AND OPERATE AIR CONTAMINANT SOURCE(S)

Permit Number: 477696
Facility (Permittee): Fluid Routing Solutions, LLC
Facility ID: 39-0057
Facility Address: 1921 North Broad Street, Lexington
Henderson County
Facility Classification: Conditional Major
Federal Requirements: 40 CFR 60, Subpart Dc
Facility Description: Rubber Automotive Hose Manufacturing

Conditional Major Permit 477696, consisting of 22 pages is hereby issued March 20, 2024, pursuant to the Tennessee Air Quality Act and by the Technical Secretary, Tennessee Air Pollution Control Board, Department of Environment and Conservation. This permit expires on May 1, 2033. The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations (TAPCR).



Michelle W. Owenby
Technical Secretary
Tennessee Air Pollution Control Board

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

Section I – Sources Included in this Permit

FACILITY DESCRIPTION			
Source Number	Source Description	Status	Control Device/Equipment
04	Fuel Burning Installation (Three Natural Gas-Fired Boilers)	Modified	None
16	Hose Curing (Vulcanizers and a Liquid Cure Unit)	Modified	None

Section II – Permit Record

Permit Type	Description of Permit Action	Issue Date
Initial	Initial combined construction/operating permit issuance	March 20, 2024

Section III - General Permit Conditions

G1. Responsible Person

The applications that were utilized in the preparation of this permit are dated January 9, 2020, signed by T. Brad Ray, EHS Coordinator, and December 15, 2023, and February 27, 2024, signed by Craig Phillips, Plant Manager, the Responsible Person for the permittee. The Responsible Person may be the owner, president, vice-president, general partner, plant manager, environmental/health/safety coordinator, or other person that is able to represent and bind the facility in environmental permitting affairs. If this Responsible Person terminates their employment or is assigned different duties and is no longer the person to represent and bind the permittee in environmental permitting affairs, the new Responsible Person for the permittee shall notify the Technical Secretary of the change in writing. The Notification shall include the name and title of the new Responsible Person assigned by the permittee to represent and bind the permittee in environmental permitting affairs, and the date the new Responsible Person was assigned these duties.

Should a change in the Responsible Person occur, the new Responsible Person must submit the Notification provided in **Appendix 1** of this permit no later than 30 days after the change. A separate notification shall be submitted for each subsequent change in Responsible Person.

TAPCR 1200-03-09-.03(8)

G2. Application and Agreement Letters

This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application(s) referenced in **Condition G1**, and any documented agreements made with the Technical Secretary.

TAPCR 1200-03-09-.01(1)(d)

G3. Submittals

Unless otherwise specified within this permit, the permittee shall submit, preferably via email and in Adobe Portable Document format (PDF), all applicable plans, checklists, certifications, notifications, test protocols, reports, and applications to the attention of the following Division Programs at the email addresses indicated in the table below:

Permitting Program	Compliance Validation Program	Field Services Program
<ul style="list-style-type: none"> • Notifications • Startup certifications • Applications • NSPS reports • MACT/GACT/NESHAP reports • Emission Statements 	<ul style="list-style-type: none"> • Test protocols • Emission test reports • Visible emission evaluation reports 	<ul style="list-style-type: none"> • Semiannual reports • Annual compliance certifications/status reports
Division of Air Pollution Control William R. Snodgrass TN Tower, 15 th Floor 312 Rosa L. Parks Avenue Nashville, TN 37243 Air.Pollution.Control@tn.gov		Jackson Environmental Field Office Division of Air Pollution Control 1625 Hollywood Drive Jackson, TN 38305 APC.JackEFO@tn.gov

The permittee shall submit the information identified above as requested in this permit. In lieu of submitting this information to the email addresses above, the permittee may submit the information to the attention of the respective Division Programs at the mailing addresses listed above.

TAPCR 1200-03-09-.03(8)

G4. Notification of Changes

The permittee shall notify the Technical Secretary for any of the following changes to a permitted air contaminant source which would not be a modification requiring a new construction permit:

- change in air pollution control equipment that does not result in an increase or otherwise meet the definition of a modification
- change in stack height or diameter
- change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

The permittee must submit the Notification provided in **Appendix 2** of this permit 30 days before the change is commenced.

TAPCR 1200-03-09-.02(7)

G5. Permit Transference

- This permit is not transferable from one air contaminant source to another air contaminant source or from one location to another location. The permittee must submit a construction permit application for a new source to the Permitting Program not less than 90 days prior to the estimated starting date of these events. If the new source will be subject to major New Source Review, the application must be submitted not less than 120 days in advance of the estimated starting date of these events.

TAPCR 1200-03-09-.03(6)(b) and 1200-03-09-.01(1)(b)

- In the event an ownership change occurs at this facility, the new owner must submit the notification provided in **Appendix 3** of this permit. The written notification must be submitted by the new owner to the Permitting Program no later than 30 days after the ownership change occurs. If the change in ownership results in a change

in Responsible Person for the facility, notification of the change in Responsible Person must also be submitted, as specified in **Condition G1**.

TAPCR 1200-03-09-.03(6)(a) and (b)

G6. Operating Permit Application Submittal

- A. The permittee shall apply for an operating permit renewal not less than 60 days prior to the permit's expiration date.

TAPCR 1200-03-09-.02(3)(a)

- B. Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in this permit, all provisions of the Tennessee Division of Air Pollution Control Regulations, and all provisions of the Tennessee Air Quality Act.

TAPCR 1200-03-09-.02(6)

G7. Startup Certification for New or Modified Source(s)

Not applicable.

G8. Fees

The air contaminant sources identified in this permit shall comply with the requirements for payment of applicable annual emission fees and annual conditional major review fees to the Tennessee Division of Air Pollution Control based on the Administrative Fees Schedule I provided in **Appendix 5** of this permit. The fee must be paid to the Division in full by the first day of the month that the fee is due (determined from **Appendix 5**). (Note: not all facilities are required to pay annual emission fees)

TAPCR 1200-03-26-.02

G9. General Recordkeeping Requirements

- A. All recordkeeping requirements for all data required to be recorded shall follow the following schedules:

For Daily Recordkeeping	For Weekly Recordkeeping	For Monthly Recordkeeping
No later than seven days from the end of the day for which the data is required.	No later than seven days from the end of the week for which the data is required.	No later than 30 days from the end of the month for which the data is required.

- B. The information contained in logs, records, and submittals required by this permit shall be kept at the facility's address, unless otherwise noted, and provided to the Technical Secretary or a Division representative upon request. Computer-generated logs are acceptable. Compliance is assured by retaining the logs, records, and submittals specified in this permit for a period of not less than five years at the facility's address.

TAPCR 1200-03-10-.02(2)(a)

G10. Routine Maintenance Requirements

The permittee shall maintain and repair the emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8)

Compliance Method: Records of all repair and maintenance activities required above shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years. The date each maintenance and repair activity began shall be entered in the log no later than seven days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than seven days after activity completion.

G11. Visible and Fugitive Emissions

- A. Unless otherwise specified, visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period, and for no more than four six-minute periods in any 24-hour period. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

Compliance Method: When required to demonstrate compliance, visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

- B. The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Reasonable precautions shall include, but are not limited to, the following:
- (a) Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
 - (b) Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;
 - (c) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 20 minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in TAPCR 1200-03-20. A malfunction is defined as, any sudden and unavoidable failure of process equipment or for a process to operate in an abnormal and unusual manner. Failures that are caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

TAPCR 1200-03-08-.01(1) and 1200-03-08-.01(2)

Compliance Method: Fugitive emissions shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

C. Fugitive emissions from roads and parking areas shall not exhibit greater than 10% opacity.

TAPCR 1200-03-08-.03

Compliance Method: When required to demonstrate compliance, fugitive emissions from roads and parking areas shall be determined by utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982, and August 24, 1984.

G12. NSPS/NESHAP/MACT/GACT Standards

The following sources are subject to and shall comply with all applicable requirements of each NSPS/NESHAP/MACT/GACT standard as indicated in the table below, including the General Provisions identified in **Appendix 9**.

Source	NESHAP/MACT/GACT	NSPS
04	Not applicable	40 CFR 60, Subpart Dc (Boiler #3 only)
16	Not applicable	Not applicable

TAPCR 1200-03-09-.03(8), 0400-30-38-.01, and 0400-30-39

Compliance Method: Compliance methods are provided in the conditions in **Section V** of this permit.

G13. VOC and NO_x Emission Statement

Not applicable.

G14. Facility-Wide Limitations (Other Than Conditional Major)

Not applicable.

G15. Permit Supersedes Statement

This permit supersedes all previously issued permits for these sources.

TAPCR 1200-03-09-.03(8)

G16. Source Testing Requirements

Not applicable.

Section IV – Conditional Major Conditions

C1. Major Source Opt-Out Requirements

The permittee has elected to opt-out of being issued a major source operating permit pursuant to TAPCR 1200-03-09-.02(11)(a). The permittee would be considered a major source because their potential to emit value for a single Hazardous Air Pollutant (HAP) was greater than 10 tons per year at the time of application. The permittee has agreed to be subject to limitations in order to be below the major source applicability threshold for a single Hazardous Air Pollutant (HAP) of 10 tons per year and combination of Hazardous Air Pollutant (HAPs) of 25 tons per year.

TAPCR 1200-03-09-.02(11)(a)

C2. Notification of Non-Compliance

Any non-compliance with any condition(s) of this permit set to restrain the potential to emit below the applicability threshold(s) of 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations, shall be reported in writing to the Technical Secretary within 15 working days of such discovery. This notification, at a minimum, shall include the identification of the source, identification of the permit condition(s) violated, and details of the violation.

TAPCR 1200-03-09-.03(8) and 1200-03-09-.02(11)(a)

C3. Failure to Abide by Conditional Major Emission Limit(s)

The permittee is placed on notice that **Condition C4** of this permit contains limitations that allow the permittee to opt-out of the major source operating permit program requirements specified in paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations. Failure to abide by these limits will not only subject the permittee to enforcement action by the State of Tennessee, but it may also result in the imposition of federal enforcement action by the United States Environmental Protection Agency and the loss of being federally recognized as a conditional major source.

TAPCR 1200-03-09-.02(11)(e)1(vi)(I)

C4. Conditional Major Emission Limit(s)

- A. Emissions from the entire facility shall not exceed the following federally enforceable maximum emission rate(s), including emissions from exempt and insignificant emission units:

Pollutant(s)	Maximum Emission Rate(s) (tons during any period of 12 consecutive months)
Individual Hazardous Air Pollutant: Carbon disulfide (listed pursuant to Section 112(b) of the Federal Act)	9.9
Combined Hazardous Air Pollutants	24.9

TAPCR 1200-03-09-.02(11)(a) and the permittee's agreement letter dated March 12, 2024 (**Appendix 7**)

Compliance Method: The permittee shall assure compliance with these emission rates by compliance with **Condition C4B** and the emission factors of $9.8 \cdot 10^{-4}$ lbs/lb rubber cured (total HAPs) and $6.4 \cdot 10^{-4}$ lbs/lb rubber cured (Carbon disulfide) from AP-42, Chapter 4.12, Table 3 (Manufacture of Rubber Products).

At the time of permit issuance, the maximum HAP emissions rate from all exempt and insignificant activities/emission units was 0.05 tons per year, respectively. These values are included in the facility-wide emission limitation.

If the facility adds insignificant or exempt activities/emission units that emit HAPs the permittee shall provide notification to the Division of the change in facility HAP emissions at least 30 days prior to the installation of each insignificant activity/emission unit [TAPCR 1200-03-09-.04(4)(a)] or at least 30 days prior to the installation of each exempt air contaminant source [TAPCR 1200-03-09-.04(4)(b), (c), or (d)].

B. The permittee shall not exceed the following federally enforceable maximum material input limitation:

Source Number	Limitation with Units and Averaging Period
16	30,000,000 pounds of raw rubber purchased during any period of 12-consecutive months

TAPCR 1200-03-09-.02(11)(a) and the permittee's agreement letter dated March 12, 2024 (**Appendix 7**)

Compliance Method: The permittee shall record the actual amount of raw rubber purchased by the facility during each calendar month and each period of 12-consecutive months in the log in **Appendix 8**, or in an alternative format, which provides the same information. The log shall be retained in accordance with **Condition G9**.

C5. Annual Compliance Status Report

The permittee shall submit a written report stating the compliance status of this facility with permit **Condition C4** by March 31 of every year. The report shall cover the preceding calendar year and shall include the records required by **Condition C4B**. The first report following issuance of this permit is due March 31, 2025, and shall cover the time period from the date of issuance of this permit to December 31, 2024. In addition, the report shall include the annual compliance status report for Permit 464024. A summary of the next reports due for the permits at this facility are listed below. Each report must include the compliance certification statement included in **Appendix 10**. Reports submitted with unsigned certification statements will be deemed incomplete.

Permit Number	Reporting Period Begins	Reporting Period Ends	Report Due Date
477696	March 20, 2024	December 31, 2024	March 31, 2025
464024	January 1, 2024	March 19, 2024	March 31, 2025

***Note: Permit 464024 has an annual compliance status report due March 31, 2024, from reporting period of January 1, 2023, to December 31, 2023*

TAPCR 1200-03-09-.03(8), 1200-03-09-.02(11)(a), and 1200-03-10-.02(2)(a)

Section V - Source Specific Permit Conditions

Source Number	Source Description
04	Fuel Burning Installation (Three Natural Gas-Fired Boilers) Boiler #1, ID #96037; Boiler #2, ID #104512; Boiler #3, ID #T13602

S1-1. Input Limitation(s) or Statement(s) of Design

A. The design heat input rate of this source is 75.3 MMBtu/hr. The design heat input rate of each boiler is 25.1 MMBtu/hr. Should the permittee need to modify the boilers in a manner that increases the design heat input rates, a construction permit shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated January 9, 2020, from the permittee.

Compliance Method: The permittee shall maintain documentation to demonstrate the design heat input rates

for the boilers. Documentation shall include, but is not limited to, manufacturer's specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

- B. Only natural gas shall be used as fuel for the boilers. Should the permittee need to modify the boilers to allow the use of a fuel other than natural gas, a construction permit shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated January 9, 2020, from the permittee.

Compliance Method: The permittee shall maintain documentation to demonstrate the type of fuel used by the boilers. Documentation shall include, but is not limited to, manufacturer's specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

S1-2. Production Limitation(s)

Not applicable.

S1-3. Operating Hour Limitation(s)

Not applicable.

S1-4. Emission Limitation(s)

- A. Particulate matter (PM) emitted from this source shall not exceed 1.8 pounds per hour on a daily average basis.

TAPCR 1200-03-06-.01(7) and the agreement letter dated March 12, 2024, from the permittee (**Appendix 7**).

Compliance Method: Compliance with the PM emission limitation shall be assured by compliance with **Condition S1-1** and the PM emission factor of 7.6 lbs/10⁶ scf from AP-42, Chapter 1.4, Table 2 (Natural Gas Combustion).

- B. Sulfur dioxide (SO₂) emitted from this source shall not exceed 0.3 pounds per hour on a daily average basis.

TAPCR 1200-03-14-.01(3) and the agreement letter dated March 12, 2024, from the permittee (**Appendix 7**).

Compliance Method: Compliance with the SO₂ emission limitation shall be assured by compliance with **Condition S1-1** and the SO₂ emission factor of 0.6 lbs/10⁶ scf from AP-42, Chapter 1.4, Table 2 (Natural Gas Combustion).

- C. Carbon monoxide (CO) emitted from this source shall not exceed 27.7 tons during any period of 12-consecutive months.

TAPCR 1200-03-06-.03(2) and the application dated January 9, 2020, from the permittee.

Compliance Method: Compliance with the CO emission limitation shall be assured by compliance with **Condition S1-1** and the CO emission factor of 84 lbs/10⁶ scf from AP-42, Chapter 1.4, Table 1 (Natural Gas Combustion).

- D. Volatile organic compounds (VOC) emitted from this source shall not exceed 1.8 tons during any period of 12-consecutive months.

TAPCR 1200-03-06-.03(2) and the application dated January 9, 2020, from the permittee.

Compliance Method: Compliance with the VOC emission limitation shall be assured by compliance with **Condition S1-1** and the VOC emission factor of 5.5 lbs/10⁶ scf from AP-42, Chapter 1.4, Table 2 (Natural Gas Combustion).

- E. Nitrogen oxides (NO_x) emitted from this source shall not exceed 33.0 tons during any period of 12-consecutive months.

TAPCR 1200-03-06-.03(2) and the application dated January 9, 2020, from the permittee.

Compliance Method: Compliance with the NO_x emission limitation shall be assured by compliance with **Condition S1-1** and the NO_x emission factor of 100 lbs/10⁶ scf from AP-42, Chapter 1.4, Table 1 (Natural Gas Combustion).

S1-5. Source-Specific Visible Emissions Limitation(s)

Not applicable.

S1-6. NSPS Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (Applicable only to Boiler #3)

- A. Under the Provisions of 40 CFR 60, Subpart Dc (Standards of Performance for New Stationary Sources – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), this facility is subject to and shall comply with 40 CFR 60, Subpart Dc as construction of Boiler #3 commenced after June 9, 1989, and the boiler “has a maximum design heat input capacity of 29 megawatts (MW) [100 million British thermal units per hour (MMBtu/hr.)] or less, but greater than or equal to 2.9 MW (10 MMBtu/hr.).”

TAPCR 1200-03-09-.03(8) and the application dated December 15, 2023, from the permittee.

Compliance Method: Compliance with 40 CFR 60, Subpart Dc shall be assured by compliance with the requirements of **Condition S1-6**.

- B. Pursuant to 40 CFR §60.48c(g), the permittee shall maintain records of the amount of natural gas combusted by Boiler #3 during each calendar month. Alternatively, the permittee shall record and maintain records of the amount of natural gas delivered to the property during each calendar month.

TAPCR 1200-03-09-.03(8)

Compliance Method: The permittee shall record the actual quantity of natural gas combusted during each calendar month by Boiler #3 or delivered to the property in the log in **Appendix 8**, or an alternative format, which provides the same information. The log must be maintained at the source location and kept available for inspection by the Technical Secretary or representative and shall be retained in accordance with **Condition G9**. The log must indicate whether the record is for natural gas combusted by Boiler #3 or natural gas delivered to the property.

Source Number	Source Description
16	Hose Curing (Vulcanizers and a Liquid Cure Unit)

S2-1. Input Limitation(s) or Statement(s) of Design

Not applicable.

S2-2. Production Limitation(s)

Not applicable.

S2-3. Operating Hour Limitation(s)

Not applicable.

S2-4. Emission Limitation(s)

- A. Volatile organic compounds (VOC) emitted from this source shall not exceed 12.4 tons during any period of 12 consecutive months.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with the VOC emission limitation shall be assured by compliance with **Condition C4B** and the VOC emission factor of $8.3 \cdot 10^{-4}$ lbs/lb rubber cured from AP-42, Chapter 4.12, Table 3 (Manufacture of Rubber Products).

- B. Hazardous air pollutants (HAPs) are emitted from this source and are included in the facility-wide emission limitation in **Condition C4**.

TAPCR 1200-03-07-.07(2)

S2-5. Source-Specific Visible Emissions Limitation(s)

Not applicable.

(end of conditions)

The permit application gives the location of this source as 35° 41' 3.2" N Latitude and 88° 23' 9.5" W Longitude.

Appendix 1: Notification of Change in Responsible Person

Facility (Permittee): Fluid Routing Solutions, LLC

Facility ID: 39-0057

Former Responsible Person:

Name	Title
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New Responsible Person:

Name	Title
Email	
Mailing Address	
Phone (office)	Phone (cell)

Date New Responsible Person was assigned this duty:

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

Appendix 2: Notification of Changes

Facility (Permittee): Fluid Routing Solutions, LLC

Facility ID: 39-0057

Source Number: _____

	Control Equipment	Stack Height (Feet)	Stack Diameter (Feet)	Exit Velocity (Feet/Second)	Exit Temperature (°F)
Current					
Proposed					
Current					
Proposed					
Current					
Proposed					

Comments:

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

Appendix 3: Notification of Ownership Change

Facility (Permittee): Fluid Routing Solutions, LLC (Previous Owner)

Facility ID: 39-0057

Facility (Permittee): _____ (New Owner) _____
Date of Ownership Change

Secretary of State Control Number: _____ [as registered with the TN Secretary of State (SOS)]

Responsible Person/Authorized Contact	Email Address
Mailing Address	Phone with area code
Principal Technical Contact	Email Address
Mailing Address	Phone with area code
Billing Contact	Email Address
Mailing Address	Phone with area code

As the responsible person for the new owner or operator of the above mentioned facility (permittee):

- I agree to not make any changes to the stationary source(s) that meet the definition of modification as defined in Division 1200-03 or Division 0400-30¹, and
- I agree to comply with the conditions contained in **the permits listed below**, Division 1200-03 and Division 0400-30 of the Tennessee Air Pollution Control Regulations, the Tennessee Air Quality Act, and any documented agreements made by the previous owner to the Technical Secretary.

List all active permits issued to the facility for which the owner wishes to assume ownership:

The information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

¹ Appropriate application forms must be submitted prior to modification of the stationary source(s).

Appendix 4: Startup Certification

Not applicable.

Appendix 5: Fees

All minor and conditional major source annual emission fees are due and payable to the Division in full according to SCHEDULE I below² unless otherwise specified in TAPCR 1200-03-26-.02(6)(c). The county that a source is located in determines when the minor source annual emission fee is due. Fees are due the first day of the month listed. If a source is located on contiguous property in more than one county, the county appearing earliest in the calendar year shall be used to determine the due date of the annual emission fee.

SCHEDULE I Month the Annual Emissions Fee is Due (Accounting Period) Counties in the Monthly Grouping

January	Anderson, Bedford, Benton, Bledsoe, Blount, Bradley and Campbell
February	Cannon, Carroll, Carter, Cheatham, Chester, Claiborne, Clay and Cocke
March	Coffee, Crockett, Cumberland, Davidson, Decatur, DeKalb, Dickson, Dyer and Fayette
April	Fentress, Franklin, Gibson, Giles, Grainger, Greene and Grundy
May	Hamblen, Hamilton, Hancock, Hardeman, Hardin, Hawkins, Haywood and Henderson
June	Henry, Hickman, Houston, Humphreys, Jackson, Jefferson, Johnson, Knox, Lake, Lauderdale, Lawrence and Lewis
July	Lincoln, Loudon, McMinn, McNairy, Macon and Madison
August	Marion, Marshall, Maury, Meigs, Monroe, Montgomery, Moore and Morgan
September	Obion, Overton, Perry, Pickett, Polk, Putnam and Rhea
October	Roane, Robertson, Rutherford, Scott, Sequatchie, Sevier, and Shelby
November	Smith, Stewart, Sullivan, Sumner, Tipton, Trousdale, Unicoi and Union
December	Van Buren, Warren, Washington, Wayne, Weakley, White, Williamson and Wilson

² Note that some sources with allowable emissions below specific thresholds are not subject to the requirement to pay annual emission fees. Contact the Emission Inventory Program at apc.inventory@tn.gov if you have any questions.

Appendix 6: Emission Statement for VOC and NO_x

Not applicable.

Appendix 7: Agreement Letters



March 12, 2024

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

RE: Permit Agreement Letter
Fluid Routing Solutions, LLC
1921 North Broad Street, Lexington
Emission Source Reference No. 39-0057 / Permit No. 477696

To the Technical Secretary:

On behalf of Fluid Routing Solutions, LLC, the following permit limitations are agreed upon for the above referenced facility in order to opt-out of being issued a major source operating permit pursuant to TAPCR 1200-03-09-.02(11)(a):

- Facility-wide Limitation
 - The maximum carbon disulfide (CS₂), a single Hazardous Air Pollutant (HAP), emitted from this source shall not exceed 9.9 tons during any period of 12-consecutive months.
 - The maximum total Hazardous Air Pollutants (HAPs) emitted from this source shall not exceed 24.9 tons during any period of 12-consecutive months.
 - Compliance with this emission limitations shall be assured by compliance with:
 - the maximum combined material purchased for Source 16 (Hose Curing) not exceeding 30,000,000 pounds of raw rubber during any period of 12-consecutive months;
 - recordkeeping of all raw rubber purchased by the facility during each calendar month and each period of 12-consecutive months to demonstrate compliance with the input rate limit;
 - the use of the CS₂ emission factor of $6.4 \cdot 10^{-4}$ lbs/lb rubber cured from AP-42, Chapter 4.12, Table 3 (Manufacture of Rubber Products);
 - the use of the total HAP emission factor of $9.8 \cdot 10^{-4}$ lbs/lb rubber cured from AP-42, Chapter 4.12, Table 3 (Manufacture of Rubber Products).

Additionally, the following permit limitations are agreed upon for the boilers located at the above referenced facility in order reduce allowable emissions and potential fees:

- Source 04: Fuel Burning Installation (Three Natural Gas-Fired Boilers)
 - The maximum particulate matter (PM) emitted from this source shall not exceed 1.8 pounds per hour on a daily average basis.
 - The maximum sulfur dioxide (SO₂) emitted from this source shall not exceed 0.3 pounds per hour on a daily average basis.
 - Compliance with these emission limitations shall be assured by compliance with:
 - the maximum heat input rate of 25.1 MMBtu/hr for each of the three boilers;
 - the use of natural gas as the only fuel source for the boilers;

- the use of the PM emission factor 7.6 lbs/10⁶ scf from AP-42, Chapter 1.4, Table 2 (Natural Gas Combustion);
- the use of the SO₂ emission factor 0.6 lbs/10⁶ scf from AP-42, Chapter 1.4, Table 2 (Natural Gas Combustion).

Should you have any questions or require additional information, please contact [Riley Webb] via phone at 731-967-3622 or via e-mail at riley.webb@pkoh-ac.com.

On behalf of Fluid Routing Solutions, I agree to the above limitations. I am authorized to represent and bind the facility in environmental affairs.

Signature Craig Phillips
Name (printed) Craig Phillips
Title Plant Manager
Date 3/12/2024

Appendix 8: Example Logs

Monthly Fuel Combusted or Delivered Log for Source 04, Boiler #3

Month & Year	Natural Gas Combusted (therms)	Natural Gas Delivered (therms)

Monthly Log of Raw Rubber Purchased for Source 16

Month and Year	Raw Rubber Purchased (pounds)	Previous 11-month Total (pounds)	12-Consecutive Month Total (pounds)

Note: This assumes a worst-case scenario where all raw rubber purchased passes through both the vulcanizers and the liquid cures. The pounds per 12-consecutive month values are the sum of the pounds of rubber cured by the source in the 11 months preceding the month just completed + the pounds cured in the month just completed. If data is not available for the 11 months preceding the initial use of the table, this value will be equal to the value for pounds per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6,000 (2) represents 6,000 pounds cured in 2 months].

Appendix 9: General Provisions for 40 CFR Part 60, Subpart Dc

You are required to comply with the following General Provisions of the federal Standards of Performance for New Stationary Sources (NSPS):

General provisions citation 40 CFR	Subject of citation	Applies to subpart	Explanation
§60.1	General applicability of the General Provisions	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.2	Definitions	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Additional terms defined in §60.54
§60.3	Units and abbreviations	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.4	Address	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.5	Determination of construction or modification	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.6	Review of plans	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.7	Notification and Recordkeeping	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.8	Performance tests	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.9	Availability of information	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.10	State Authority	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.11	Compliance with standards and maintenance requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.12	Circumvention	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.13	Monitoring requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.14	Modification	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.15	Reconstruction	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.16	Priority list	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§60.17	Incorporations by reference	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.18	General control device requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§60.19	General notification and reporting requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

TAPCR 1200-03-09-.03(8)

Appendix 10: Compliance Certification Statement

Facility (Permittee): Fluid Routing Solutions, LLC

Facility Address: 1921 North Broad Street

Facility ID: 39-0057

Conditional Major Permit Number	Reporting Period	Report Deadline

This report is required pursuant to TAPCR 1200-03-09-.02(11)(a).

Responsible Person Certification

I, the undersigned, am a Responsible Person (as described in **Condition G1**) of the facility for which this report is being submitted. This document consists of _____ pages and they are numbered from page ____ to _____. As a Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Annual Compliance Status Report is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)